Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems	)	CC Docket No.94-102
	)	
Amendment of Parts 2 and 25 to Implement the Global Mobile personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements; Petition of the National Telecommunications and Information Administration to Amend Part 25 of the Commission's Rules to Establish Emissions Limits for Mobile and Portable Earth Stations Operating in the 1610-1660.5 MHz Band	)	IB Docket No. 99-67

COMMENTS OF THE COLORADO 9-1-1 ADVISORY TASK FORCE

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9-1-1 Advisory Task Force

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COLORADO 9-1-1 ADVISORY TASK FORCE

The Colorado 9-1-1 Advisory Task Force ("Task Force") generally supports the Federal Communications Commission ("FCC" or "Commission") requiring providers of multi-line telephone systems ("MLTS") to comply with its E9-1-1 rules, in particular requiring callback and distinctive location information to be delivered to Public Safety Answering Points ("PSAPs").[1] The Task Force believes the public interest and public safety necessitate the same E9-1-1 requirements for MLTS, which are generally indistinguishable from wireline phones to the ordinary customer, as for wireline and wireless telephonic devices. The customer expectation is that a 9-1-1 call from a PBX phone and a wireline phone should be dialed the

[1] The following comments are submitted on behalf of the Task Force as a whole with the exception of Qwest.

same way and provide the same information (i.e., a distinctive callback number and location identification) to the PSAP.

I. Introduction

The Task Force appreciates the opportunity to submit the following comments in this docket. The Task Force, comprised of representatives from PSAPs, governing bodies, consumers, equipment manufacturers, and telecommunications service providers, including the basic emergency service provider, Qwest Corporation ("Qwest"), was established by the Colorado Public Utilities Commission ("CPUC") in 1992 to assist in implementing 9-1-1 service throughout the state. At that time, almost a third of Colorado's counties had no 9-1-1 service. Having successfully accomplished its original mission of implementing E9-1-1 throughout the state, the Task Force has continued to coordinate 9-1-1 enhancement efforts including research and reports on subjects such as ALI database formatting standards, ALI data transfer, network and related issues to assist the CPUC in developing rules for emergency reporting services throughout the State of Colorado. The Task Force is also assisting with the implementation of Phase I and II wireless enhanced 9-1-1 throughout the state. In general, the Task Force evaluates alternate technologies, service, and pricing issues related to implementation of a cost-effective statewide E9-1-1 system. The Task Force accomplishes this mission strictly through cooperation and coordination, as well as a commitment to public safety and E9-1-1 implementation.

The Task Force consists of members representing the following entities: Colorado Counties, Inc., Colorado Municipal League, Office of Consumer Counsel, Federal Communications Commission, the Colorado chapter of the National Emergency Number Association (NENA) and Disabled Telephone Users. At least five members of the Task Force represent 9-1-1 Authority Boards or PSAPs. The remaining members of the Task Force

represent the Basic Emergency Service Provider, Competitive Local Exchange Carriers ("CLECs"), Wireless Providers, Resellers of Basic Service, Competitive Access Providers, Consumers, and the ALI Data Base Provider. The membership of the Task Force is appointed such that a majority shall represent governing bodies, consumers and PSAPs or 9-1-1 Authority Boards rather than the telecommunications industry. The following comments are submitted on behalf of the Task Force as a whole with the exception of Qwest.

The Task Force strives to accomplish, on a state level, what we believe the FCC should do on a national level: provide the most comprehensive, advanced 9-1-1 emergency system to consumers that current technology allows while preparing the system for future upgrades and new technology. Consumers have come to expect a certain level of 9-1-1 service, especially in Colorado where the entire state is covered by Enhanced 9-1-1 service. As new technologies such as wireless phones, telematics, and even IP telephony replace more traditional means of wireline 9-1-1 access, it is important that the same level of emergency access be provided to consumers. In fact, development of solutions to provide enhanced 9-1-1 services does not impede growth or competition, it may actually help to stimulate new advances and technologies.

The Task Force provides the following comments specifically addressing the issues of MLTS. Although we have an interest in extending E9-1-1 requirements to telematics and other services mentioned in the Further Notice of Proposed Rulemaking ("FNPRM"), the Task Force has not discussed and taken a position on these other devices as it has on MLTS.

II. Discussion

MLTS offer consumers, both business and residential, more options for provision of telecommunications services, including basic local telephone service. In fact, since the Telecommunications Act of 1996 allowed for more competition, the number of MLTS providers

has increased as well as the implementation of such services for residential uses. MLTS can substitute for wireline basic local telephone service in apartments, townhomes and condominium complexes, resorts, long-term care facilities, office buildings, hospitals, school classrooms, university dormitories, etc. When dialing 9-1-1, consumers using a MLTS are unlikely to realize they are dialing from a multi-line switch. They have no reason to expect their 9-1-1 call must be dialed differently (e.g., with a 9 to access the public switched network) or will be transmitted differently (e.g., without a distinctive call back number and location identification). This situation leads to confusion and potentially delayed response, thus endangering public safety and lives.

For example, a Colorado Springs apartment complex is equipped with a PBX system for phone service. During a domestic violence episode, a caller to 9-1-1 had a difficult time describing their location and the police had only the main address of the complex. Inability to locate the caller delayed the response and limited public safety's ability to assist those in need.

MLTS systems should deliver location information to allow emergency responders to narrow the search area if a caller cannot describe the location. There should also be an associated callback phone number for the location. The FCC should mandate a minimum standard for information delivered to the PSAPs based on the NENA standards. The requirements for E9-1-1 for MLTS should be no different than the current requirements for wireline and wireless E9-1-1 calls.

In reviewing the criteria suggested by the Commission for analyzing whether a particular category of provider should be required to comply with its E9-1-1 requirements, we conclude that MLTS meets all those enumerated in ¶13 of the FNPRM. We offer the following analysis for MLTS:

(1) MLTS clearly meets the first standard of offering real-time, two-way voice service interconnected to the public switched network, whether on a stand-alone basis or in a package of other telecommunications services;

(2) The customers definitely have a reasonable expectation of access to 9-1-1 and E9-1-1 services, which is the same as their reasonable expectation of access from a regular wireline phone due to the transparency of the MLTS;

(3) MLTS competes with traditional local exchange services in the kinds of multi-unit residential dwellings, schools, and businesses mentioned previously in our comments; and,

(4) Technical solutions for delivering callback numbers and location information for most MLTS systems have been developed and can be implemented to support E9-1-1.

In Colorado, only a small fraction of PBXs are actually equipped with the capability to deliver the callback number and distinct location identification. The private switch automatic location identification ("PS/ALI") service is provided in less than 5 percent of PBXs. MLTS operators are not required by state or federal law to provide E9-1-1, and are unlikely to do so unless there is such a requirement. States with severe budget crises like Colorado are unlikely to impose such a mandate at this time due to the perceived cost involved to implement it.

Although ¶84 of the FNPRM indicates that Colorado has a law requiring some form of callback and location information requirements for MLTS, this is incorrect and is also incorrectly represented by NENA in the chart on its website. Colorado does not require PBX resellers to implement any additional E9-1-1 capabilities. Instead, Colorado enacted legislation and rules in 2001-2002 that required MLTS operators to disclose to their end-users the location identification

capability of their systems and the correct 9-1-1 dialing pattern to reach the PSAP (see §29-11-106, C.R.S.). The Task Force provided the draft language and worked with the legislature and the CPUC to implement these disclosure requirements. The Task Force decided that it was better to start with a disclosure requirement to raise awareness of the E9-1-1 limitations of MLTS before seeking an E9-1-1 mandate for MLTS.

The CPUC does not have jurisdiction to require either equipment manufacturers or MLTS operators to implement E9-1-1 without specific authorization from the legislature. Very few state and local governments have addressed this issue. By the FCC's own count, only a handful of states require callback and location information to be delivered by multi-line systems, and only eleven states have authorized municipalities to adopt specific E9-1-1 requirements. When the Task Force sought disclosure legislation on MLTS from the Colorado General Assembly, we discovered that most legislators were unaware that MLTS did not deliver callback and location information to PSAPs from a 9-1-1 call. Many MLTS operators and owners were similarly unaware.

The FCC has jurisdiction to require equipment manufacturers to implement full E9-1-1 capability and to require, by a specific date, MLTS operators to meet the same E9-1-1 requirements as wireline and wireless phones. With minimum federal requirements, the Task Force can more easily take the MLTS E9-1-1 issue to the legislature and seek a state solution. While cost of implementation will be the major objection, as telecommunications technology has developed recently, implementing upgrades to MLTS systems to provide E9-1-1 services can be done in conjunction with full telecommunications resource management and not considered a stand-alone cost.

The Task Force generally supports the NENA Model Legislation: Enhanced 9-1-1 for Multi-line Telephone Systems with its phased-in approach. We have reviewed and discussed implementing some of that language in Colorado. Although we are mindful of the significant opposition to such mandates from the business community, including MLTS operators, we also believe it to be essential to public safety to pursue it.

III. Conclusion

The Colorado 9-1-1 Advisory Task Force supports the Commission requiring MLTS operators and providers to comply with its E9-1-1 rules, in particular requiring callback and distinctive location information to be delivered to PSAPs. The public interest and public safety necessitate the same E9-1-1 requirements for MLTS as are currently in place for wireline and wireless telephonic devices.

Respectfully submitted,

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